Section 1. Registration Information

Source Identification

Facility Name: BHP Copper, Pinto Valley Unit

Parent Company #1 Name: **BHP Billiton**

Parent Company #2 Name:

Submission and Acceptance

Submission Type: First-time submission

Subsequent RMP Submission Reason:

Description:

Receipt Date: 02-Oct-2012 Postmark Date: 02-Oct-2012 Next Due Date: 02-Oct-2017 Completeness Check Date: 02-Oct-2012 Yes

Complete RMP:

De-Registration / Closed Reason:

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registered / Closed Effective Date:

Certification Received:

Facility Identification

EPA Facility Identifier: 1000 0021 9435

Other EPA Systems Facility ID:

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:

Parent Company #1 DUNS: Parent Company #2 DUNS:

Facility Location Address

2911 N Forest Service Road 287 Street 1:

Street 2:

City: Miami State: **ARIZONA** ZIP: 85539

ZIP4:

County: **GILA**

Facility Latitude and Longitude

Latitude (decimal): 33.394268 Longitude (decimal): -110.967660

Interpolation - Digital map source (TIGER) Lat/Long Method:

Lat/Long Description: Center of Facility

Horizontal Accuracy Measure: 25

Horizontal Reference Datum Name: World Geodetic System of 1984

Source Map Scale Number:

Owner or Operator

Operator Name: BHP Copper, Pinto Valley Operation

Operator Phone: (928) 473-6400

Mailing Address

Operator Street 1: 2911 N Forest Service Road 287

Operator Street 2:

Operator City:MiamiOperator State:ARIZONAOperator ZIP:85539

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP: Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person: Sandi Richardson
RMP Title of Person or Position: Environmental Specialist

RMP E-mail Address: Sandi.SR.Richardson@bhpbilliton.com

Emergency Contact

Emergency Contact Name: Sandi Richardson

Emergency Contact Title: Environmental Specialist

Emergency Contact Phone: (928) 473-6253 Emergency Contact 24-Hour Phone: (928) 812-2662

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address: Sandi.SR.Richardson@bhpbilliton.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage

Address:

Local Emergency Planning Committee

LEPC: Gila County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site: 600

FTE Claimed as CBI:

Covered By

OSHA PSM: Yes

EPCRA 302 : CAA Title V:

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External

Agency:

Never had one

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name: Spencer Collins
Preparer Phone: (801) 806-0933

Preparer Street 1: 125 E Main St., Ste 122

Preparer Street 2:

Preparer City: American Fork

Preparer State: UTAH Preparer ZIP: 84003

Preparer ZIP4:

Preparer Foreign State: Preparer Foreign Country: Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided: Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine

if there were any accidents reported for this RMP.

Process Chemicals

Process ID: 1000037368

Description: Ammonia Supply
Process Chemical ID: 1000045030

Program Level: Program Level 3 process
Chemical Name: Ammonia (anhydrous)

CAS Number: 7664-41-7

Quantity (lbs): 65662

CBI Claimed:

Flammable/Toxic: Toxic

Process NAICS

Process ID: 1000037368
Process NAICS ID: 1000037749

Program Level: Program Level 3 process

NAICS Code: 21223

NAICS Description: Copper, Nickel, Lead, and Zinc Mining

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000030956

Percent Weight: 100.0

Physical State: Gas liquified by pressure Model Used: EPA's RMP*Comp(TM)

Release Duration (mins):10Wind Speed (m/sec):1.5Atmospheric Stability Class:FTopography:Rural

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:

Other Type:

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000032908

Percent Weight: 100.0

Physical State: Gas liquified by pressure Model Used: EPA's RMP*Comp(TM)

Wind Speed (m/sec): 3.0
Atmospheric Stability Class: D
Topography: Rural

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:

Flares: Scrubbers:

Emergency Shutdown:

Other Type:

Yes

Facility Name: BHP Copper, Pinto Valley Unit EPA Facility Identifier: 1000 0021 9435

Section 4. Flammables: Worst Case

No records found.

Plan Sequence Number: 1000030678

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID: 1000038903

Chemical Name: Ammonia (anhydrous)

Flammable/Toxic: Toxic CAS Number: 7664-41-7

Prevention Program Level 3 ID: 1000032779
NAICS Code: 21223

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

25-Sep-2012

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

20-Jul-2012

The Technique Used

What If:

Checklist:

What If/Checklist:

Yes

HAZOP:

Failure Mode and Effects Analysis:

Fault Tree Analysis: Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

Major Hazards Identified

Toxic Release: Yes Fire: Yes

Explosion:

Runaway Reaction: Polymerization:

Overpressurization: Yes
Corrosion: Yes
Overfilling: Yes

Contamination:

Equipment Failure: Yes Loss of Cooling, Heating, Electricity, Instrument Air: Yes

Earthquake:

Floods (Flood Plain):

Facility Name: BHP Copper, Pinto Valley Unit EPA Facility Identifier: 1000 0021 9435 Plan Sequence Number: 1000030678 Tornado: Hurricanes: Other Major Hazard Identified: **Process Controls in Use** Vents: Relief Valves: Yes Check Valves: Scrubbers: Flares: Manual Shutoffs: Yes Automatic Shutoffs: Interlocks: Alarms and Procedures: Yes Keyed Bypass: Emergency Air Supply: **Emergency Power:** Backup Pump: Grounding Equipment: Inhibitor Addition: Rupture Disks: **Excess Flow Device:** Quench System: Purge System: None: Other Process Control in Use: Mitigation Systems in Use Sprinkler System: Dikes: Fire Walls: Blast Walls: Deluge System: Water Curtain: Enclosure: Neutralization: None: Yes Other Mitigation System in Use: Monitoring/Detection Systems in Use Process Area Detectors: Yes Perimeter Monitors: None: Other Monitoring/Detection System in Use: Changes Since Last PHA Update Reduction in Chemical Inventory: Increase in Chemical Inventory:

Installation of Process Detection Systems:

Change Process Parameters: Installation of Process Controls:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None: Yes

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 28-Sep-2012

Training

Training Revision Date (The date of the most recent 25-Sep-2012 review or revision of training programs):

The Type of Training Provided

Classroom:

On the Job:

Other Training: online training

The Type of Competency Testing Used

Written Tests:

Oral Tests:

Demonstration:

Yes

Observation:

Other Type of Competency Testing Used:

web-based training (tests)

Maintenance

Maintenance Procedures Revision Date (The date of 28-Sep-2012 the most recent review or revision of maintenance procedures):

Equipment Inspection Date (The date of the most recent equipment inspection or test):

12-Sep-2012

Equipment Tested (Equipment most recently inspected or tested):

Storage system (upon placement of the tank)

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures):

Pre-Startup Review

Facility Name: BHP Copper, Pinto Valley Unit EPA Facility Identifier: 1000 0021 9435

Plan Sequence Number: 1000030678

Pre-Startup Review Date (The date of the most recent pre-startup review):

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

25-Sep-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 25-Sep-2012 recent review or revision of hot work permit procedures):

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

25-Sep-2012

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

25-Sep-2012

Confidential Business Information

CBI Claimed:

Facility Name: BHP Copper, Pinto Valley Unit EPA Facility Identifier: 1000 0021 9435

Plan Sequence Number: 1000030678

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Yes

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):

Local Agency

Agency Name (Name of local agency with which the Tri City Fire Dept. facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(928) 473-2362

Subject to

OSHA Regulations at 29 CFR 1910.38:

Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154,

49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws:

Other (Specify):

Executive Summary

1. Accidental Release Prevention and Emergency Response Policies

The BHP facility seeks to comply with all applicable federal, state, and local regulations. All employees are informed of hazards in the workplace. Employees who work with potentially hazardous substances receive proper training in the handling of those substances. This facility has procedures in place to safely remove employees from areas in the unlikely event that a hazardous substance release were to occur, and to put in place emergency notification and response procedures.

Facility and Regulated Substances

BHP is located in Miami, AZ. The regulated substance at this facility, anhydrous ammonia, is used in an injection type process for pH control. In order to protect its employees, the public and the environment, BHP has an integrated PSM/RMP program to prevent ammonia releases and mitigate the consequences of a release, should one occur.

3. Worst Case and Alternative Case Release Scenarios

Off Site Consequence (OCA) data is available for review onsite at the facility.

4. General Accidental Release Prevention Program and Ammonia Specific Prevention

The BHP facility has an emergency plan that addresses the response necessary for a release of ammonia from the system. Because of the pungent odor of ammonia, any leak is easily detected. BHP personnel and/or contractors have been trained and are knowledgeable in the safe operation of the process. In case of a release that could travel off the plant property, calls would be made to the Fire Department and/or the County Disaster Services Coordinator to assist in the response. Other state and federal notifications would be made as required.

5. Five Year Accident History

This is a new material at this location, and during the last five years, there have been no reportable releases of ammonia.

6. Emergency Response Program

This facility has procedures in place to respond to the release of a hazardous substance. Employees are trained to evacuate their respective areas in accordance with OSHA 1910.38(a). Coordination with the local fire department is initiated during an emergency situation.

7. Planned Changes to Improve Safety

BHP expects to improve safety performance by emphasizing all elements of the PSM/RMP program. All recommendations during the PHA were designed to improve the safety performance of the ammonia process. BHP expects to evaluate each recommendation in a timely manner and implement, as soon as possible, those recommendations that will reduce the possibility of a release and/or mitigate the consequences of an unintentional release.